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**From:** James W. Bartlett, Jr.  
**Sent:** Friday, May 12, 2023 3:18 PM  
**To:** tberghman@munsch.com; drukavina@munsch.com  
**Cc:** Matthew Okin; Edward Clarkson  
**Subject:** RE: MBGH's Second 2004 Production

Thomas/Davor, if you would like to talk over the weekend about this production, I can make myself available.

Thanks.

Jim



**James W. Bartlett, Jr.**  
**Okin Adams Bartlett Curry LLP**  
1113 Vine St. Suite 240  
Houston, Texas 77002  
Direct: (713) 255-8851  
Main: (713) 228-4100  
Fax: (346) 247-7158  
[jbartlett@okinadams.com](mailto:jbartlett@okinadams.com)  
[www.okinadams.com](http://www.okinadams.com)  
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**From:** James W. Bartlett, Jr.  
**Sent:** Friday, May 12, 2023 2:53 PM  
**To:** Thomas Berghman <tberghman@munsch.com>; Davor Rukavina <drukavina@munsch.com>; 'Guffy, Philip' <PGuffy@hunton.com>; Adam Langley <Adam.Langley@butlersnow.com>  
**Cc:** Matthew S. Okin <mokin@okinadams.com>; Edward A. Clarkson III <eclarkson@okinadams.com>  
**Subject:** FW: MBGH's Second 2004 Production

Adding Davor at his request. Davor, the link below should allow you to download yesterday's and today's productions.

Thanks.

Jim

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**ShareFile Attachments**

Expires June 11, 2023

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MBGH - 2004 Prod 00006-MBGH - 2004 Pr...006.pdf	371.6 KB

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**From:** James W. Bartlett, Jr.

**Sent:** Friday, May 12, 2023 2:10 PM

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**Cc:** Matthew S. Okin <[mokin@okinadams.com](mailto:mokin@okinadams.com)>; Edward A. Clarkson III <[eclarkson@okinadams.com](mailto:eclarkson@okinadams.com)>

**Subject:** MBGH's Second 2004 Production

All:

Below please find a link to download MBGH's second production of documents in response to the Goodman Trustee's 2004 document requests.

**NOTES:**

- 1) Yesterday's production was Bates-labeled MBGH – 2004 Prod 00001-00581.
- 2) Today's production is Bates-labeled MBGH – 2004 Prod 00582-01257.

- 3) There is a specific procedure that must be followed under the existing protective order, as modified and augmented by the interim 2004 order (both are attached to this email) before anyone required to execute Exhibit A, B, or C to the protective order (I will circulate the final amended versions of those shortly as required by the interim 2004 order) is permitted to view any materials designated as "Confidential Information" or "Confidential Attorney Eyes Only Information." **MBGH expects strict compliance with these orders with respect to MBGH's 2004 productions, including, without limitation, Paragraphs 10 and 11 of the protective order, as modified by the interim 2004 order.**
- 4) A handful of pages in the financials are hard to see without zooming in. However, the data is clear once you zoom in. If this is a problem, I have some ideas and we can discuss.
- 5) The draft 10-K we produced yesterday was just that – a draft. Another draft may be created before it goes final. If that happens, I will produce it.

Thanks.

Jim

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